College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

Privacy Impact Assessment

Table of Contents

Use this privacy impact assessment (PIA) template if you are starting a new initiative or significantly changing an existing initiative.

Before you start

- An initiative is an enactment, system, project, program or activity
- Find information on the PIA review process and question-by-question guidance.
- If you have any questions, contact the CNC Privacy Office at foipp@cnc.bc.ca

PART 1: GENERAL INFORMATION

PIA file number:

Initiative title:	CompTracker
Organization:	College of New Caledonia

CNC PIA Form – updated March 2022

Branch or unit:	School of Health Sciences
Your name and title:	Jennifer Scott
Your work phone:	250 562 2131 Ext 5607
Your email:	scottj20@cnc.bc.ca
Initiative Lead name and title:	Wendy Male
Initiative Lead phone:	250 562 2131 Ext 5587
Initiative Lead email:	malew@cnc.bc.ca
Privacy Officer:	
Privacy Officer phone:	
Privacy Officer email:	

General information about the PIA:

Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.
No
Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.
No
Related PIAs, if any:
N/A

CNC PIA Form – updated March 2022

College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

1.   What is the initiative?

Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.

Comp Tracker is a program for tracking student attainment of competencies in the clinical environment. Comp Tracker is an application that helps to enter, track, and manage information associated with a student's progress in skill or competency focused programs. Comp Tracker allows programs to manage their students and the student assessment processes using digital workflows, with a proprietary combination of online and mobile apps working together.

CompTracker, part of parent company Great Big Solutions, is a cloud-based service that stores data on Azure servers in Toronto, Canada.

During the PIA development, CompTracker was asked privacy related questions and replied by email. The email from ▇▇▇▇▇▇ is appended to this PIA.

22(3)(d)

The dental assisting and dental hygiene program faculty will use Comp Tracker. Clinical courses for dental hygiene take place on campus in CNC's dental clinic and student evaluations are overseen by Faculty. Clinical courses for dental assisting take place in CNC's dental clinic but also consist of practicum placements in dental offices where dental office employees enter student evaluation information into CompTracker.

2.   What is the scope of the PIA?

Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?

CNC PIA Form – updated March 2022

College
of New
Caledonia
CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

This PIA will address the collection, use, disclosure, storage, and security of personal information in the Great Big Solutions: Comp Tracker products used by CNC dental programs.

3.   What are the data or information elements involved in your initiative?

Please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in a table below or in an appendix.

- Student first and last name
- Student email address
- Student unique identifier number (Student ID)
- Student Comp Tracker username
- Student performance evaluations and observations during practicums (off-site – dental assisting), labs, and clinics (onsite – dental hygiene)

Usernames, clinical number, email addresses, and student IDs are provided to Comp Tracker by the Program Coordinator in order to set up individual accounts.

3.1   Did you list personal information in question 3?

Personal information is any recorded information about an identifiable individual, other than **business contact information. Personal information includes information that can be used to identify an individual through association or reference.**

Yes.

- If yes, go to Part 2
- If no, answer question 4 and submit questions 1 to 4 to your Privacy Officer. You do not need to complete the rest of the PIA template.

CNC PIA Form – updated March 2022

College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

4. How will you reduce the risk of unintentionally collecting personal information?
Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.

N/A

PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

5. Collection, use and disclosure

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
Program Coordinators gather student information from CNC Connect (CNC's student database)	Use	32(b)	
Program Coordinator sends Comp Tracker student profile information via email.	Disclosure	33(2)(c)	

College
of New
Caledonia
CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

Comp Tracker creates student profiles using the information the Program Coordinators provide	Use	32(b)	
Faculty, students, peers, and preceptors provide grade/feedback in CompTracker	Collection	26(c) 26(d)(ii)	
Student reviews grade received and might write reflection	Collection	26(c) 26(d)(i)	
Program faculty members enter student grades from CompTracker into CNC Connect	Use	32(a)	
Student profiles in Comp Tracker are retained for one year after graduation and then permanently deleted.	Use	32(a)	

6. Collection Notice

If you are collecting personal information directly from an individual the information is about, FOIPPA requires that you provide a collection notice (except in limited circumstances).

The following collection notice will be provided to students on the clinical course Moodle pages and within the course syllabus with the link to the CompTracker website.

The College of New Caledonia Uses the CompTracker application and collects personal information under the authority of the Freedom of Information and Protection of Privacy Act section 26(c) and the College and Institute Act 41.1(2)(a). The information is collected for the purpose of evaluating student performance in clinics, labs, and practicum placements. If you have any questions about the collection, use, or disclosure of the personal information please contact the Dean of Health Sciences at healthscience@cnc.bc.ca.

CNC PIA Form – updated March 2022

College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

7.   Is any personal information stored outside of Canada?

No. CompTracker has indicated that all data is stored in Canada at all times – including backups. See appended email from ███████** from CompTracker.   22(3)(d)

8.   **Does your initiative involve sensitive personal information?**

Sensitive personal information **is personal information with a higher risk of harm to individuals if the information is improperly collected, used, or disclosed. Personal information may be considered sensitive depending on the type of information and the context in which it is collected, used, disclosed, or stored. Examples of sensitive personal information may include personal health information, genetic and biometric data, personal financial information, geolocation data, and criminal records.**

No

   - If yes, go to question 9
   - If no, go to question 10

9.   Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

N/A

   - If yes, go to question 10
   - If no, go to Part 4

10.   Where are you storing the personal information involved in your initiative?

The information is stored on Azure servers in Toronto, Canada.

CNC PIA Form – updated March 2022

College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

After you answer this question go to Part 5.

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization's Privacy Officer.

Personal information is not disclosed outside of Canada. Please skip ahead to section 5.

11.   Is the sensitive personal information stored by a service provider?

Type "yes" or "no" to indicate your response.

- If yes, fill in the table below (add more rows if necessary) and go to question 13
- If no, go to question 12

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?

12.   Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

13.   Does the contract you rely on include privacy-related terms?

Type "yes" or "no" to indicate your response.

- If yes, describe the contractual measures related to your initiative.

College
of New
Caledonia
CNC

PRIVACY IMPACT ASSESSMENT
CompTracker
PIA#22-004

15. What controls are in place to prevent unauthorized access to sensitive personal information?

16. Provide details about how you will track access to sensitive personal information.

College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT

CompTracker

PIA#22-004

17. Describe the privacy risks for disclosure outside of Canada.

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary.

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high, considering the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.

College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

Outcome of Part 4

The outcome of Part 4 will be **a risk-based decision made by the head of the public body on whether to proceed with the initiative**, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 17. **The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.**

PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

18.   Does your initiative involve digital tools, databases or information systems?

Yes.

- If yes, work with your Privacy Officer to determine whether you need a security assessment to ensure the initiative meets the reasonable security requirements of FOIPPA section 30

    18.1   Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

The ITS department has completed a security assessment of CompTracker. The application is considered secure by ITS and relevant information is included below.

Given that CompTracker will not integrate with CNC's technical systems and data and it is standalone, an STRA is deemed not necessary by ITS.

CNC PIA Form – updated March 2022

College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

- If yes, you may want to append the security assessment to this PIA. Go to question 20
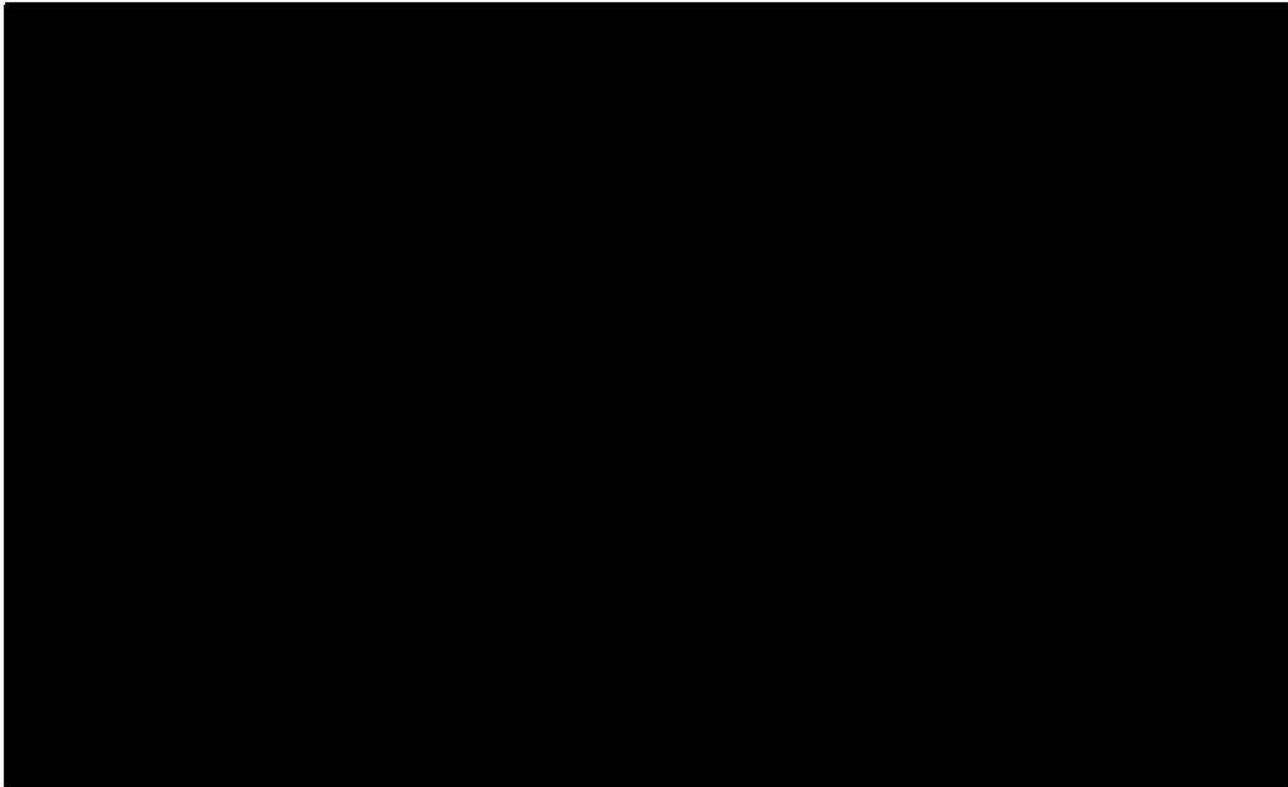
- If no, go to question 19

19. **What technical and physical security do you have in place to protect personal information?**

   Describe where the digital records for your initiative are stored (e.g. on your organization's LAN, on your computer desktop, etc.) and the technical security measures in place to protect those records. Technical security measures include secure passwords, encryption, firewalls, etc. Physical security measures include restricted access to filing cabinets or server locations, locked doors, security guards, etc.

   If you have completed a security assessment, you may want to append it to the PIA.
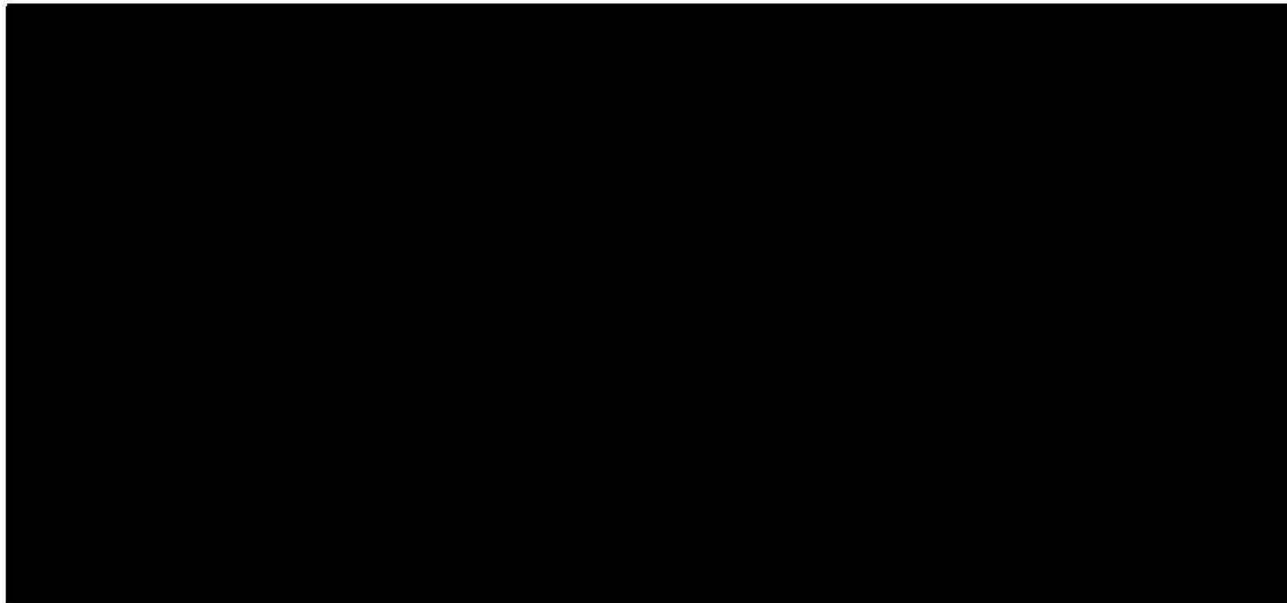
   CompTracker

15(1)(l)

15(1)(l)

CNC PIA Form – updated March 2022

College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

CompTracker's privacy policy is linked on every page of the application, and is available here.

CNC

15(1)(l)

20. **Controlling and tracking access**

Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

Strategy	
Faculty are only given access to records of students in courses they are teaching	☒
Faculty/Preceptor access is granted by the Program Coordinator for the respective dental program.	☒
	☒

15(1)(l)

CNC PIA Form – updated March 2022

Strategy	
Students are given access to CompTracker through the login and password information ██████████████ Students only access their own clinical profile. If providing peer feedback, student completes and submits an observation form which does not show the evaluations of other students.	☒ 15(1)(l)
Describe any additional controls: ████████████████████████████████ Student records are deleted one year after graduation by CompTracker.	15(1)(l)

PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

21. How will you make sure that the personal information is accurate and complete?

    FOIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete.

    Group leader will review the personal information that is documented within Comp Tracker for accuracy with the student during the first group leader conference of each semester.

    Group leaders, clinical faculty, and preceptors make every reasonable effort to ensure information they enter into the Comp Tracker is accurate.

    Subsequently, each week/two weeks the group leader will review the personal information that has been submitted since the last meeting.

CNC PIA Form – updated March 2022

22. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

    22.1   Do you have a process in place to correct personal information?

Yes, if the personal information is incorrect the student can notify the Program Coordinator. The Program Coordinator will contact Comp Tracker to correct the personal information. The Program Coordinator will confirm with the student that the information has been corrected.

    22.2   Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

Students can request that their personal information be updated in CompTracker through the process identified above.

If the student believes their competency/skill evaluation(s) are inaccurate, they can follow the appeals process defined in CNC academic policies.

    22.3   If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

Not applicable. Personal information is not disclosed beyond CompTracker to any other third parties.

23. **Does your initiative use personal information to make decisions that directly affect an individual?**

Yes

College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

- If yes, go to question 24.
- If no, skip ahead to Part 7.

24. Do you have an information schedule in place related to personal information used to make a decision?

FOIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision. In addition, the Information Management Act requires that you dispose of government information only in accordance with an approved information schedule.

Yes. CompTracker will permanently delete the student records one year after completing the program.

PART 7: AGREEMENTS AND INFORMATION BANKS

Please provide information about whether your initiative will involve an information sharing agreement, research agreement or personal information bank.

25. Does your initiative involve an information sharing agreement?

No.

- If yes, please complete the Information Sharing Agreement Supplement and attach it to your PIA

26. Will your initiative result in a personal information bank?

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

Yes.

- If yes, please complete the table below.

Describe the type of information in the bank

College
of New
Caledonia
CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

Dental Studies CompTracker Clinical, Lab, and Practicum Student Evaluation
Name of main organization involved
College of New Caledonia
Any other ministries, agencies, public bodies or organizations involved
CompTracker, Great Big Solutions
Business contact title and phone number for person responsible for managing the PIB
Jennifer Scott Dental Studies Instructor 250 562 2131 Ext 5607 scottj20@cnc.bc.ca   Annette Kitchen Dental Assisting Instructor 250 562 2131 ext 5610 kitchena@cnc.bc.ca

PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.

27. **Risk response**

    Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

    Add new rows if necessary.

CNC PIA Form – updated March 2022

College
of New
Caledonia
CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004

Possible risk	Response
Information is compromised while emailing.	Email file encryption recommended.
Misuse of student data by CNC.	Confidentiality and privacy training for employees and disclosure only to employees who require access.
Lack of program admin duties and procedures may expose information to privacy risk.	Procedures recommended, more information below.

PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

Privacy Office Comments

Suggestions for the secure administration and management of CompTracker:

13(1)

College
of New
Caledonia
CNC

PRIVACY IMPACT ASSESSMENT
CompTracker

PIA#22-004
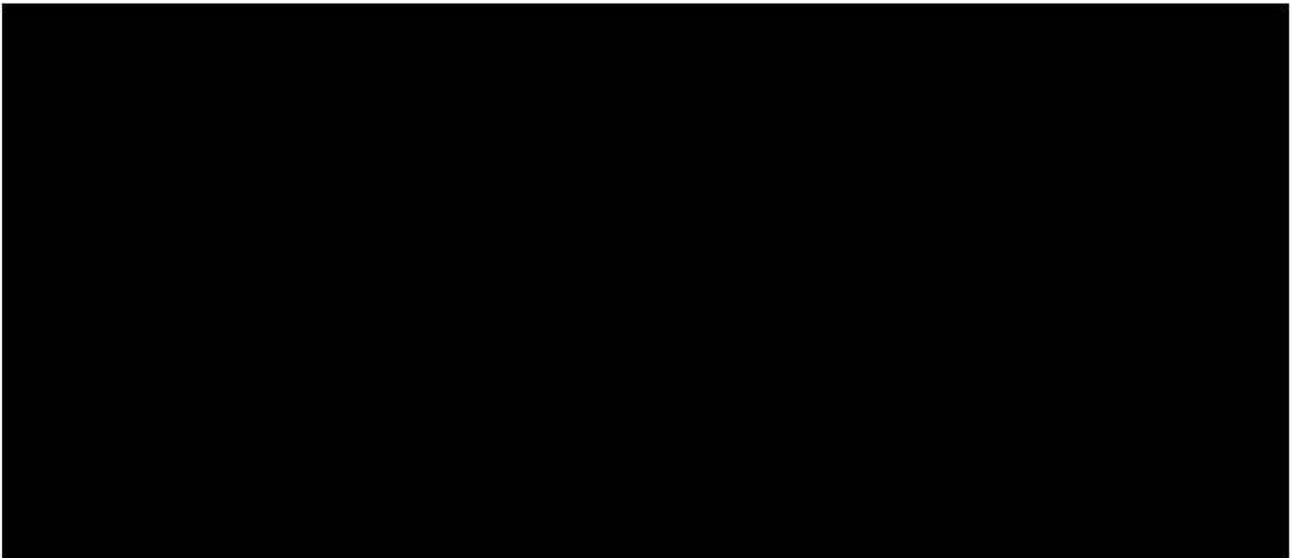
Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

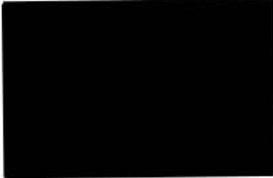| Role	Name	Electronic signature	Date signed
Privacy Officer / Privacy Office Representative			

Program Area Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

Program Area Comments:

Role	Name	Electronic signature	Date signed
Initiative lead	Jennifer Scott *ANNETTE KITCHEN*	███████████	Aug 29, 2022 *Aug 30/2022* 22(1)
Program/Department Manager	Tamara Chambers-Richards	TLARichards	August 30, 2022
Contact Responsible for Systems Maintenance and/or Security			

Role	Name	Electronic signature	Date signed	
Only required if they have been involved in the PIA				
Head of public body, or designate Only required if personal information is involved	Elyse Giddens	███████████	October 5, 2022	22(1)

CNC PIA Form – updated March 2022